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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
PORTLAND DIVISION

NICKALAS BRADSHAW,  
MEGAN BRADSHAW

Plaintiffs,

Case No. 3:10-CV-00438-HA

v.

BAC HOME LOANS SERVICING, LP, a foreign  
corporation; TRANS UNION, LLC, a foreign  
company; EXPERIAN INFORMATION  
SOLUTIONS, INC., a foreign corporation,  
EQUIFAX INFORMATION SERVICES LLC,  
a foreign company.

Defendants.

MOTION FOR EXTENSION OF TIME  
TO PROVIDE EXPERT WITNESS  
REPORTS

Pursuant to LR 7.1 the plaintiffs have attempted to confer with defendants. BAC Home Loan Services joins in this motion. Experian and Equifax did not respond to plaintiffs' request. Trans Union had questions for plaintiffs about the motion; however, due to the time difference in counsel's location plaintiffs' counsel was not able to speak to Trans Union's counsel about its questions.

Plaintiffs move the Court for an order extending the deadline to provide expert witness reports for an additional 60 days. Currently, discovery is ongoing. Plaintiff and BAC Home Loans have agreed to a form of protective order which will be circulated to the parties and then the Court. After the protective order is entered, BAC Home Loans will provide documents which are needed for plaintiffs' expert to prepare a report. Granting an additional 60 days will allow plaintiffs' expert to receive and review the documents necessary to provide a report that complies with Rule 26.

No party will be prejudiced by an extension because discovery is ongoing and the defendants will be able to conduct discovery after the report is provided to the defendants.

Wherefore, plaintiffs request that the Court extend the expert witness report deadline by 60 days.

Dated: October 8, 2010

/s/ Keith D. Karnes  
Keith D. Karnes OSB # 03352  
Attorney for Plaintiffs

CERTIFICATE OF SERVICE

I, Keith Karnes, certify that I filed the foregoing document via ECF which will in turn serve:

Justin M. Baxter and Keith D. Karnes for Plaintiffs;  
Pilar C. French for Defendant, BAC Home Loans Servicing, LP;  
William R. Brown for Defendant, Trans Union, LLC;  
Angela M. Taylor for Defendant, Experian Information Solutions, Inc.; and  
K. Ann Broussard for Defendant, Equifax Information Services LLC.

DATED October 8, 2010.

/s/ Keith D. Karnes  
Keith D. Karnes OSB # 03352  
Attorney for plaintiffs